

SAUL EWING LLP  
1888 CENTURY PARK EAST, SUITE 1500  
LOS ANGELES, CALIFORNIA 90067  
(310) 255-6100

1 ZEV SHECHTMAN (BAR NO. 266280)  
Zev.Shechtman@saul.com  
2 CAROL CHOW (BAR NO. 169299)  
carol.chow@saul.com  
3 RYAN COY (BAR NO. 324939)  
ryan.coy@saul.com  
4 SAUL EWING LLP  
1888 Century Park East, Suite 1500  
5 Los Angeles, California 90067  
Telephone: (310) 255-6100  
6 Facsimile: (310) 255-6200

7 Attorneys for Phillip Christensen, as Receiver

8 **UNITED STATES DISTRICT COURT**

9 **EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

11 METROPOLITAN LIFE INSURANCE  
COMPANY, a New York corporation,

12 Plaintiff,

13 vs.

14 ACDF, LLC, a California limited liability  
15 company, et al.,

16 Defendants.

Lead Case No. 1:24-cv-01261-KES-SAB

Consolidated with Case Nos:  
1:24-cv-01226; 1:24-cv-01230; 1:24-cv-  
01231; 1:24-cv-01232; 1:24-cv-01233; 1:24-  
cv-01235; and 1:24-cv-01241

**RECEIVER'S OMNIBUS SUMMARY  
REPORT**

Hearing:

Date: January 13, 2025

Time: 1:30 p.m.

Place: Robert E. Coyle U.S. Courthouse  
2500 Tulare Street  
Courtroom 6, 7th Floor  
Fresno, CA 93721

- 17 ☒ Affects All Cases  
18 ☐ Affects Metropolitan Life Ins. Co. v.  
19 ACDF, LLC, et al., 1:24-cv-01261  
20 ☐ Affects Metropolitan Life Ins. Co. v.  
FNF Farms, LLC, et al., 1:24-cv-01226  
21 ☐ Affects Metropolitan Life Ins. Co. v. C  
& A Farms, LLC, et al., 1:24-cv-01230  
22 ☐ Affects Metropolitan Life Ins. Co. v.  
Maricopa Orchards, LLC, et al., 1:24-  
23 cv-01231  
24 ☐ Affects Brighthouse Life Ins. Co. v.  
Kamm South, LLC, et al., 1:24-cv-  
25 01232  
26 ☐ Affects Brighthouse Life Ins. Co. v.  
Manning Avenue Pistachios, LLC, et  
27 al., 1:24-cv-01233 Case No. 1:24-cv-  
01233

- ☐ Affects Brighthouse Life Ins. Co. v. ACDF, LLC, et al., 1:24-cv-01235
- ☐ Affects MetLife Real Estate Lending, LLC v. Panoche Pistachios, LLC, et al., 1:24-cv-01241

**TO THE HONORABLE KIRK E. SHERRIFF, UNITED STATES DISTRICT  
JUDGE, PLAINTIFFS, DEFENDANTS, AND INTERESTED PARTIES:**

Phillip Christensen, as Receiver (the “Receiver”), hereby submits this report on the status of the above-captioned administratively consolidated cases pursuant to the Court’s appointment orders.

**General Statement**

The Receiver was appointed by this Court’s appointment orders entered in eight separate civil actions (the “Receivership Cases”) filed by Plaintiffs Metropolitan Life Insurance Company, Brighthouse Life Insurance Company, and MetLife Real Estate Lender, LLC (collectively, the “Plaintiffs”). By orders of this Court entered on or about December 12, 2024, the eight Receivership Cases have been consolidated for administrative purposes. Each of the appointment orders required that the Receiver file a report summarizing the receivership on or before January 6, 2025. See Receivership Order (lead case at docket no. 45) at page 20, lines 1-2. Accordingly, the Receiver is submitting this omnibus report.

The Receiver oversees and manages farming operations on the Receivership Properties and is developing business strategies to preserve and maximize their value for the benefit of the Receivership estates.

Further, since the Receiver’s appointment, the Receiver has been diligently working, together with his attorneys and accountants, to fulfill the duties set forth in the appointment orders. While specific detail is provided below, the Receiver’s administrative activities include the following:

Immediately upon appointment, the Receiver obtained federal tax identification numbers

for each estate; and thereafter opened a separate fiduciary operating bank account and depositing bank account with East West Bank for each estate. The Receiver maintains separate books and records for each of the eight Receivership Cases. The Receiver has recorded copies of the appointment orders in the counties where the Receivership real properties are located.

The Receiver has been in regular communication with Lance Miller, the receiver appointed by the Court in a separate receivership action filed by The Prudential Insurance Company of America and PGIM Real Estate Finance, LLC (Case No. 1:24-cv-01102-KES-SAB). The Receiver has been coordinating with Mr. Miller regarding the interviews of investment bankers and real estate brokers for a potential coordinated sale process. The Receiver has also communicated with Mr. Miller regarding collections received by Mr. Miller from crop processors.

The Receiver has employed Saul Ewing LLP as his lead receivership counsel in the Receivership Cases, and has employed SLBiggs, a Division of SingerLewak, LLP, as his receivership accountants. The Receiver also intends to employ water counsel. To handle farming operations, the Receiver has engaged farm managers, consultants and related service providers.

The Receiver is in regular communication with the Plaintiffs concerning the preservation, management, and value maximization of the Receivership Property, which is the Plaintiff's collateral.

Pursuant to the appointment orders, the Receiver will be filing monthly reports on the operations and financial affairs, commencing on or before January 31, 2025, covering November and December 2024, and by the last date of each month of the Receivership thereafter. See Receivership Order (lead case at docket no. 45) at ¶ 48.

The Receiver lacks complete access to the business information of the defendants and/or the Receivership Property existing prior to the Receiver's appointment. Accordingly, some of the Receiver's information may be incomplete.

## **The Receivership Cases**

### **1. Metropolitan Life Insurance Company v. ACDF, LLC, et al.**

#### **a. Case Number: 1:24-cv-01261-KES-SAB [lead case number in**

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LOS ANGELES, CALIFORNIA 90067  
(310) 255-6100

1 administratively consolidated Receivership Cases]

2                   **b. Plaintiff:** Metropolitan Life Insurance Company

3                   **c. Defendants:**

4                   i. ACDF, LLC

5                   ii. Ashlan & Hayes Investments, LLC

6                   iii. Grantor Fresno Clovis Investments, LLC

7                   iv. Maricopa Orchards, LLC

8                   v. Farid Assemi

9                   vi. Farshid Assemi

10                  vii. Darius Assemi

11                  viii. Willow Avenue Investments, LLC

12                  **d. Date Case Filed:** 10/16/24

13                  **e. Receivership Order Entered:** 11/7/24

14                  **f. Bond Filed:** 11/18/24

15                  **g. Inventory Filed:** 12/6/24

16                  **h. Summary of Receivership:** The Receivership property is comprised of

17 598.70 acres of real estate comprised of cherries, pistachios, open land, and associated irrigation

18 and agricultural facilities in Fresno and Kern Counties. Attached as **Exhibit “1”** is a farm activity

19 update describing any cultural activities with respect to the subject Receivership Property.

20

21           **2. Metropolitan Life Insurance Company v. FNF Farms, LLC et al.**

22                   **a. Case Number:** 1:24-cv-01226-KES-SAB

23                   **b. Plaintiff:** Metropolitan Life Insurance Company

24                   **c. Defendants:**

25                   i. FNF Farms, LLC

26                   ii. Farid Assemi

27                   iii. Darius Assemi

28                   iv. Farshid Assemi

d. **Date Case Filed:** 10/9/24

e. **Receivership Order Entered:** 11/18/24

f. **Bond Filed:** 11/27/24

g. **Inventory Filed:** 12/18/24

h. **Summary of Receivership:** The Receivership property is comprised of 486.40 acres of real estate comprised of almonds, and associated irrigation and agricultural facilities in Fresno County. Attached as **Exhibit “2”** is a farm activity update describing any cultural activities with respect to the subject Receivership Property.

3. **Metropolitan Life Insurance Company v. C & A Farms, LLC et al.**

a. **Case Number:** 1:24-cv-01230-KES-SAB

b. **Plaintiff:** Metropolitan Life Insurance Company

c. **Defendants:**

i. C & A Farms, LLC

ii. Maricopa Orchards, LLC

iii. Dumar, LLC

iv. Pistache LLC

v. Farshid Assemi

vi. Farid Assemi

vii. Darius Assemi

d. **Date Case Filed:** 10/10/24

e. **Receivership Order Entered:** 11/7/24

f. **Bond Filed:** 11/18/24

g. **Inventory Filed:** 12/6/24

h. **Summary of Receivership:** The Receivership property is comprised of 1,094.54 acres of real estate comprised of pistachios and associated irrigation and agricultural facilities in Fresno County, as well as a membership interest in Poso Creek Water Company, LLC. The subject real property has been leased by defendants Dumar, LLC and Pistache, LLC, as

tenants. Attached as **Exhibit “3”** is a farm activity update describing any cultural activities with respect to the subject Receivership Property.

**4. Metropolitan Life Insurance Company v. Maricopa Orchards, LLC et al.**

**a. Case Number:** 1:24-cv-01231-KES-SAB

**b. Plaintiff:** Metropolitan Life Insurance Company

**c. Defendants:**

i. Maricopa Orchards, LLC

ii. Farid Assemi

iii. Farshid Assemi

iv. Darius Assemi

**d. Date Case Filed:** 10/10/24

**e. Receivership Order Entered:** 11/18/24

**f. Bond Filed:** 11/27/24

**g. Inventory Filed:** 12/18/24

**h. Summary of Receivership:** The Receivership property is comprised of 159.69 acres of real estate comprised of blueberries and associated irrigation and agricultural facilities in Kern County. Attached as **Exhibit “4”** is a farm activity update describing any cultural activities with respect to the subject Receivership Property.

**5. Brighthouse Life Insurance Company v. Kamm South, LLC et al.**

**a. Case Number:** 1:24-cv-01232-KES-SAB

**b. Plaintiff:** Brighthouse Life Insurance Company

**c. Defendants:**

i. Kamm South, LLC

ii. Farid Assemi

iii. Farshid Assemi

iv. Darius Assemi

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LOS ANGELES, CALIFORNIA 90067  
(310) 255-6100

- 1                   d.     **Date Case Filed:** 10/10/24
- 2                   e.     **Receivership Order Entered:** 11/25/24
- 3                   f.     **Bond Filed:** 12/6/24
- 4                   g.     **Inventory Filed:** 12/30/24
- 5                   h.     **Summary of Receivership:** The Receivership property is comprised of
- 6 394.97 acres of real estate comprised of pistachios and associated irrigation and agricultural
- 7 facilities in Fresno County, and a 3.25% membership interest in Poso Creek Water Company,
- 8 LLC. Attached as **Exhibit “5”** is a farm activity update describing any cultural activities with
- 9 respect to the subject Receivership Property.

10

11           6.     **Brighthouse Life Insurance Company v. Manning Avenue Pistachios, LLC et**

12 **al.**

- 13                   a.     **Case Number:** 1:24-cv-01233-KES-SAB
- 14                   b.     **Plaintiff:** Brighthouse Life Insurance Company
- 15                   c.     **Defendants:**
- 16                             i.     Manning Avenue Pistachios, LLC
- 17                             ii.    Donald E. Schramm and Nada L. Schramm Revocable Trust Dated
- 18 12/2/2010
- 19                             iii.   The Thomsen Family Trust Dated 11/24/2010
- 20                             iv.   Daniel L. Sweet
- 21                             v.   Carole A. Sweet
- 22                             vi.   Donald E. Schramm
- 23                             vii.   Nada L. Schramm
- 24                             viii.   Keith A. Thomsen
- 25                             ix.   Catherine S. Thomsen
- 26                             x.   Farid Assemi
- 27                   d.     **Date Case Filed:** 10/10/24
- 28                   e.     **Receivership Order Entered:** 12/3/24

f. **Bond Filed:** 12/9/24

g. **Inventory Filed:** 12/31/24

h. **Summary of Receivership:** The Receivership property is comprised of 551.38 acres of real estate comprised of pistachios, almonds, open land and associated irrigation and agricultural facilities in Fresno County, as well as a 2.5% membership interest in Poso Creek Water Company, LLC.

The real property comprising the Receivership Property was the subject of a purchase offer that was in escrow prior to the appointment of the Receiver. The Receiver is pursuing a potential sale of the subject Receivership Property. Attached as **Exhibit “6”** is a farm activity update describing any cultural activities with respect to the subject Receivership Property.

7. **Brighthouse Life Insurance Company v. ACDF, LLC, et al.**

a. **Case Number:** 1:24-cv-01235-KES-SAB

b. **Plaintiff:** Brighthouse Life Insurance Company

c. **Defendants:**

i. C & A Farms, LLC

ii. Maricopa Orchards, LLC

iii. Cantua Orchards, LLC

iv. Farid Assemi

v. Farshid Assemi

vi. Darius Assemi

vii. ACDF, LLC

d. **Date Case Filed:** 10/10/24

e. **Receivership Order Entered:** 11/22/24

f. **Bond Filed:** 12/6/24

g. **Inventory Filed:** 12/30/24

h. **Summary of Receivership:** The Receivership property is comprised of 378.75 acres of real estate comprised of fallow lands and agricultural facilities in Kern and Fresno



Counties. Attached as **Exhibit “7”** is a farm activity update describing any cultural activities with respect to the subject Receivership Property.

**8. MetLife Real Estate Lending, LLC v. Panoche Pistachios, LLC et al.**

**a. Case Number:** 1:24-cv-01241-KES-SAB

**b. Plaintiff:** MetLife Real Estate Lending, LLC

**c. Defendants:**

i. Panoche Pistachios, LLC

ii. Willow Avenue Investments, LLC

iii. Farid Assemi

iv. Farshid Assemi

v. Darius Assemi

**d. Date Case Filed:** 10/11/24

**e. Receivership Order Entered:** 11/18/24

**f. Bond Filed:** 11/27/24

**g. Inventory Filed:** 12/18/24 and 1/2/24 (amended)

**h. Summary of Receivership:** The Receivership property is comprised of 529.02 acres of real estate comprised of almonds, open land and associated irrigation and agricultural facilities in Kern County. Attached as **Exhibit “8”** is a farm activity update describing any cultural activities with respect to the subject Receivership Property.

DATED: January 6, 2025

SAUL EWING LLP

By:



ZEV SHECHTMAN

Attorneys for Phillip Christensen, as Receiver

# **EXHIBIT 1**

**Exhibit 1****Metropolitan Life Insurance Company v. ACDF, LLC, et al.**

<b>Block/Field ID(s)</b>	<b>Region</b>	<b>Crop</b>	<b>Cultural Activities (Nov. 7th, 2024 – Jan. 5th, 2025)</b>
15101	Kamm Ave	Pistachio	<ul style="list-style-type: none"> <li>• General/Miscellaneous               <ul style="list-style-type: none"> <li>○ Engaged with Diversified Land Company, LLC to act as farm management company for the subject property</li> <li>○ Obtained Fresno County pesticide permit for the 2025 crop year. The permit was issued to the receivership estate</li> <li>○ Property Taxes were paid</li> </ul> </li> <li>• Pruning               <ul style="list-style-type: none"> <li>○ Developed pruning strategy and budget for the farm management team. The expected start date for labor crews to begin pruning is 1/7/2025</li> </ul> </li> <li>• Vertebrate Control</li> <li>• 2025 Crop Marketing Efforts               <ul style="list-style-type: none"> <li>○ Negotiated marketing contract for the 2025 crop with Setton Pistachio</li> </ul> </li> </ul>
15123	Copus	Cherry	<ul style="list-style-type: none"> <li>• General/Miscellaneous               <ul style="list-style-type: none"> <li>○ Engaged with Diversified Land Company, LLC to act as farm management company for the subject property.</li> <li>○ Obtained Kern County pesticide permit for the 2025 crop year. The permit was issued to the receivership estate.</li> <li>○ Property taxes were paid</li> </ul> </li> <li>• Vertebrate control</li> <li>• Pollination               <ul style="list-style-type: none"> <li>○ Ordered bee hives in preparation for the upcoming flower bloom</li> </ul> </li> <li>• Repairs &amp; Maintenance               <ul style="list-style-type: none"> <li>○ Irrigation reservoir required repairs to the outer wall</li> <li>○ Flushed out irrigation line and conducted general repairs in preparation for the irrigation season.</li> </ul> </li> </ul>

# **EXHIBIT 2**

**Exhibit 2****Metropolitan Life Insurance Company v. FNF Farms, LLC, et al.**

<b>Block/Field ID(s)</b>	<b>Region</b>	<b>Crop</b>	<b>Cultural Activities (Nov 7, 2024 – Jan 5, 2025)</b>
28201, 28301, & 28401	Kamm Ave	Almond	<ul style="list-style-type: none"> <li>• General/Miscellaneous <ul style="list-style-type: none"> <li>○ Engaged with Diversified Land Company, LLC to act as farm management company for the subject property.</li> <li>○ Obtained Fresno County pesticide permit for the 2025 crop year. The permit was issued to the receivership estate.</li> <li>○ Property Taxes were paid</li> </ul> </li> <li>• Winter Sanitation <ul style="list-style-type: none"> <li>○ mummy shaking will begin on January 15.</li> </ul> </li> <li>• Vertebrate Control</li> <li>• Repairs &amp; Maintenance <ul style="list-style-type: none"> <li>○ Flushed out irrigation line and conducted general repairs in preparation for the irrigation season</li> </ul> </li> <li>• Pollination <ul style="list-style-type: none"> <li>○ Ordered bee hives in preparation for the upcoming flower bloom</li> </ul> </li> <li>• 2025 Crop Marketing Efforts <ul style="list-style-type: none"> <li>○ Signed marketing contract for the 2025 crop with Panoche Creek Packing</li> </ul> </li> </ul>

# **EXHIBIT 3**

**Exhibit 3****Metropolitan Life Insurance Company v. C & A Farms, LLC, et al.**

<b>Block/Field ID(s)</b>	<b>Region</b>	<b>Crop</b>	<b>Cultural Activities (Nov 7, 2024 – Jan 5, 2025)</b>
09308	Mt. Whitney	Pistachio	<ul style="list-style-type: none"> <li>• Not applicable <b>leased out</b> <ul style="list-style-type: none"> <li>○ The property is currently leased out and is operated by defendant Pistache, LLC</li> </ul> </li> </ul>
22308	Mt. Whitney	Pistachio	<ul style="list-style-type: none"> <li>• Not applicable <b>leased out</b> <ul style="list-style-type: none"> <li>○ The property is currently leased out and is operated by defendant Dumar, LLC</li> </ul> </li> </ul>

# **EXHIBIT 4**



**Exhibit 4****Metropolitan Life Insurance Company v. Maricopa Orchards, LLC, et al.**

<b>Block/Field ID(s)</b>	<b>Region</b>	<b>Crop</b>	<b>Cultural Activities (Nov. 7th, 2024 – Jan. 5th, 2025)</b>
23123	Sebastian	Blueberry	<ul style="list-style-type: none"> <li>• General/Miscellaneous <ul style="list-style-type: none"> <li>○ Engaged with Diversified Land Company, LLC to act as farm management company for the subject property</li> <li>○ Obtained Kern County pesticide permit for the 2025 crop year. The permit was issued to the receivership estate</li> <li>○ Property Taxes were paid</li> </ul> </li> <li>• Vertebrate control</li> <li>• Repairs &amp; Maintenance <ul style="list-style-type: none"> <li>○ Flushed out irrigation line and conducted general repairs in preparation for the irrigation season</li> </ul> </li> <li>• Pollination <ul style="list-style-type: none"> <li>○ Ordered bee hives in preparation for the upcoming flower bloom</li> </ul> </li> </ul>

# **EXHIBIT 5**

**Exhibit 5****Brighthouse Life Insurance Company v. Kamm South, LLC, et al.**

<b>Block/Field ID(s)</b>	<b>Region</b>	<b>Crop</b>	<b>Cultural Activities (Nov. 7th, 2024 – Jan. 5th, 2025)</b>
20201, 20301, 21401, & 20301	Kamm Ave	Pistachio	<ul style="list-style-type: none"> <li>• General/Miscellaneous <ul style="list-style-type: none"> <li>○ Engaged with Diversified Land Company, LLC to act as farm management company for the subject property</li> <li>○ Obtained Fresno County pesticide permit for the 2025 crop year. The permit was issued to the receivership estate</li> <li>○ Property Taxes were paid</li> </ul> </li> <li>• Pruning <ul style="list-style-type: none"> <li>○ Developed pruning strategy and budget for the farm management team. The expected start date for labor crews to begin pruning is 1/7/2025</li> </ul> </li> <li>• Repairs &amp; Maintenance <ul style="list-style-type: none"> <li>○ Flushed out irrigation line and conducted general repairs in preparation for the irrigation season</li> </ul> </li> <li>• Vertebrate Control</li> <li>• 2025 Crop Marketing Efforts <ul style="list-style-type: none"> <li>○ Negotiated marketing contract for the 2025 crop with Setton Pistachio</li> </ul> </li> </ul>

# **EXHIBIT 6**

**Exhibit 6****Brighthouse Life Insurance Company v. Manning Avenue Pistachios, LLC, et al.**

<b>Block/Field ID(s)</b>	<b>Region</b>	<b>Crop</b>	<b>Cultural Activities (Nov. 7th, 2024 – Jan. 5th, 2025)</b>
90205	Manning /Kamm Ave	Pistachio	<ul style="list-style-type: none"> <li>• General/Miscellaneous               <ul style="list-style-type: none"> <li>○ Engaged with Diversified Land Company, LLC to act as farm management company for the subject property</li> <li>○ Obtained Fresno County pesticide permit for the 2025 crop year. The permit was issued to the receivership estate</li> <li>○ Property Taxes were paid</li> </ul> </li> <li>• Pruning               <ul style="list-style-type: none"> <li>○ Developed pruning strategy and budget for the farm management team. The expected start date for labor crews to begin pruning is 1/7/2025</li> </ul> </li> <li>• Repairs &amp; Maintenance               <ul style="list-style-type: none"> <li>○ Flushed out irrigation line and conducted general repairs in preparation for the irrigation season</li> </ul> </li> <li>• Vertebrate Control</li> <li>• 2025 Crop Marketing Efforts               <ul style="list-style-type: none"> <li>○ Negotiated marketing contract for the 2025 crop with Setton Pistachio</li> </ul> </li> </ul>
04501	Kamm Ave	Almond	<ul style="list-style-type: none"> <li>• General/Miscellaneous               <ul style="list-style-type: none"> <li>○ Engaged with Diversified Land Company, LLC to act as farm management company for the subject property.</li> <li>○ Obtained Fresno County pesticide permit for the 2025 crop year. The permit was issued to the receivership estate.</li> <li>○ Property Taxes were paid</li> </ul> </li> <li>• Winter Sanitation               <ul style="list-style-type: none"> <li>○ mummy shaking will begin on January 15.</li> </ul> </li> <li>• Vertebrate Control</li> <li>• Repairs &amp; Maintenance               <ul style="list-style-type: none"> <li>○ Flushed out irrigation line and conducted general repairs in preparation for the irrigation season</li> </ul> </li> <li>• Pollination               <ul style="list-style-type: none"> <li>○ Ordered bee hives in preparation for the upcoming flower bloom</li> </ul> </li> <li>• 2025 Crop Marketing Efforts               <ul style="list-style-type: none"> <li>○ Signed marketing contract for the 2025 crop with Panoche Creek Packing</li> </ul> </li> </ul>

# **EXHIBIT 7**

**Exhibit 7****Brighthouse Life Insurance Company v. ACDF, LLC, et al.**

<b>Block/Field ID(s)</b>	<b>Region</b>	<b>Crop</b>	<b>Cultural Activities (Nov 7, 2024 – Jan 5, 2025)</b>
35401, 90620, & 25123	Kamm Ave	Open Ground	<ul style="list-style-type: none"> <li>• Not applicable <ul style="list-style-type: none"> <li>○ Subject property is currently fallow</li> </ul> </li> </ul>
90620	Ludy	Open Ground	<ul style="list-style-type: none"> <li>• Not applicable <ul style="list-style-type: none"> <li>○ Subject property is currently fallow</li> </ul> </li> </ul>
25123	Hall, Malott, Antongiovanni	Open Ground	<ul style="list-style-type: none"> <li>• Not applicable <ul style="list-style-type: none"> <li>○ Subject property is currently fallow</li> </ul> </li> </ul>

# **EXHIBIT 8**



**Exhibit 8****MetLife Real Estate Lending, LLC v. Panoche Pistachios, LLC, et al.**

<b>Block/Field ID(s)</b>	<b>Region</b>	<b>Crop</b>	<b>Cultural Activities (Nov 7, 2024 – Jan 5, 2025)</b>
72021, 72321	Wells	Almond	<ul style="list-style-type: none"> <li>• General/Miscellaneous <ul style="list-style-type: none"> <li>○ Engaged with Diversified Land Company, LLC to act as farm management company for the subject property.</li> <li>○ Obtained Kern County pesticide permit for the 2025 crop year. The permit was issued to the receivership estate.</li> <li>○ Property Taxes were paid</li> </ul> </li> <li>• Winter Sanitation <ul style="list-style-type: none"> <li>○ mummy shaking will begin on January 15.</li> </ul> </li> <li>• Vertebrate Control</li> <li>• Repairs &amp; Maintenance <ul style="list-style-type: none"> <li>○ Flushed out irrigation line and conducted general repairs in preparation for the irrigation season</li> </ul> </li> <li>• Pollination <ul style="list-style-type: none"> <li>○ Ordered bee hives in preparation for the upcoming flower bloom</li> </ul> </li> <li>• 2025 Crop Marketing Efforts <ul style="list-style-type: none"> <li>○ Signed marketing contract for the 2025 crop with Panoche Creek Packing</li> </ul> </li> </ul>

1 **PROOF OF SERVICE OF DOCUMENT**

2 I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding.  
3 My business address is: **Saul Ewing 1888 Century Park East, Suite 1500, Los Angeles, CA 90067.**

4 A true and correct copy of the document entitled: **Receiver's Omnibus Summary Report** will be served or was served **(a)** on the judge in chambers in the form and manner required  
5 by LBR 5005-2(d); and **(b)** in the manner stated below:

6 **1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING**

7 **(NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served  
8 by the court via NEF and hyperlink to the document. On **January 6, 2025**, I checked the  
9 CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the  
10 following persons are on the Electronic Mail Notice List to receive NEF transmission at the email  
11 addresses stated below:

12 ☒ Service information continued on attached page

13 **2. SERVED BY UNITED STATES MAIL:**

14 On **January 6, 2025**, I served the following persons and/or entities at the last known addresses in  
15 this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed  
16 envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing  
17 the judge here constitutes a declaration that mailing to the judge will be completed no later than 24  
18 hours after the document is filed.

19 ☒ Service information continued on attached page

20 **3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served):

21 Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **January 6, 2025**, I served the following persons and/or  
22 entities by personal delivery, overnight mail service, or (for those who consented in writing to  
23 such service method), by facsimile transmission and/or email as follows. Listing the judge here  
24 constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed  
25 no later than 24 hours after the document is filed.

26 ☒ Service information continued on attached page

27 I declare under penalty of perjury under the laws of the United States that the foregoing is true and  
28 correct.

January 6, 2025  
*Date*

Hannah Richmond  
*Printed Name*

/s/ Hannah Richmond  
*Signature*

SAUL EWING LLP  
1888 CENTURY PARK EAST, SUITE 1500  
LOS ANGELES, CALIFORNIA 90067  
(310) 255-6100

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- **Mark Anishchenko**  
markanishchenko@dwt.com,rosalindcook@dwt.com
- **Robert Cullen Barton**  
rbarton@mwe.com,acorona@mwe.com,abeasley@mwe.com,mnadel@mwe.com
- **Michael Barrett Brown**  
michael.brown@stoel.com,docketclerk@stoel.com,rebecca.lerma@stoel.com,jill.kehnen@stoel.com,ha.nguyen@stoel.com
- **John D. Freed**  
jakefreed@dwt.com,kimberlysimmonsgruene@dwt.com
- **Michael S. Nadel , PHV**  
mnadel@mwe.com
- **Zev M. Shechtman**  
Zev.Shechtman@saul.com,Shelly.Guise@saul.com,hannah.richmond@saul.com,LitigationDocketing@saul.com
- **Brodie Austin Surfus**  
bsurfus@wtjlaw.com,borozco@wtjlaw.com
- **Marshall Craig Whitney**  
mwhitney@wtjlaw.com,sgomez@wtjlaw.com,abroome@wtjlaw.com
- **Thomas Andrew Woods**  
thomas.woods@stoel.com,docketclerk@stoel.com,dalila.tobin@stoel.com,1261239420@filing.docketbird.com,rebecca.lerma@stoel.com

**2. SERVED BY UNITED STATES MAIL (continued):**

John A. Bezmalinovic, General Counsel	Fay Pugh
Katrina Ingrao	Law Offices of Saul Reiss, P.C.
The Assemi Group	11835 W. Olympic Blvd., Suite 415E
5260 N. Palm Ave., Suite 421	Los Angeles, Ca 90064
Fresno, CA 93704	
Ashlan & Hayes Investments, LLC	Grantor Fresno Clovis Investments, LLC
c/o Agent for Service of Process	c/o Agent for Service of Process
John A. Bezmalinovic, General Counsel	John A. Bezmalinovic, General Counsel
The Assemi Group	The Assemi Group
5260 N. Palm Ave., Suite 421	5260 N. Palm Ave., Suite 421
Fresno, CA 93704	Fresno, CA 93704
Dirk B. Paloutzian	
Natalya M. Ferdinandi	
Baker Manock & Jensen, PC	
5260 North Palm Avenue, Suite 201	
Fresno, California 93704	

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (continued) :**

**VIA EMAIL:**

- JBezmalinovic@assemigroup.com

SAUL EWING LLP  
1888 CENTURY PARK EAST, SUITE 1500  
LOS ANGELES, CALIFORNIA 90067  
(310) 255-6100

- 1 • kingrao@assemigroup.com
- 2 • reisslaw@reisslaw.net
- 3 • fay.pugh@outlook.com
- 4 • dpaloutzian@bakermanock.com
- 5 • nferdinandi@bakermanock.com
- 6 • AThomson@bakermanock.com
- 7 • ben.codog@stoel.com
- 8 • michelle.rosales@stoel.com
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